

UNITED STATES DISTRICT COURT FOR THE
DISTRICT OF SOUTH CAROLINA
BEAUFORT DIVISION

JOE HAND PROMOTIONS, INC.,

ANSWER

Plaintiff,

Civil Action No. 9:09-2427-CWH

vs.

CALLAHAN SPORTS, INC., CALLAHAN'S
SSPORTS BAR & DELUXE GRILL, &
VICTOR D. NEELEY,

Defendants.

Defendant, VICTOR D. NEELY, and the Callahan Defendants, by their attorney,
Clabaugh Law Offices, P.A., answer the Complaint of the Plaintiff, herein respectfully
sets forth and alleges, upon information and belief, answers as follows:

1. Except as hereinafter specifically admitted all material allegations are denied and strict proof demanded thereof.
2. Admit the allegations of paragraphs 1, 2, 4, 6 and 7 of the complaint.
3. Answering the allegations of paragraph 8 of the complaint Neeley alleges that on September 22, 2007 he was out of the State of South Carolina celebrating his anniversary. He further alleges that he knew nothing about the alleged wrongful acts complained of and that to the extent said acts occurred, they took place without his knowledge or permission.

CLABAUGH LAW OFFICES, P.A.

_S/_Frank H. Clabaugh, Esq

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November 4, 2009